



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th St, Suite 3200
HELENA, MONTANA 59626**

Ref: 8MO

October 22, 2012

Gallatin National Forest
Lonesome Wood Vegetation Management 2
Attn: Teri Seth, Team Leader
Bozeman Ranger District
3710 Fallon St., Suite C
Bozeman, Montana 59718

Re: CEQ 20120324; EPA Comments on Lonesome Wood
Vegetation Management 2 Final EIS

Dear Ms. Seth:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) for the Gallatin National Forest's Lonesome Wood Vegetation Management 2 Project in accordance with EPA's responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321 *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C., Section 7609.

The EPA appreciates receipt of responses to agency and public DEIS questions and comments in Appendix C of the FEIS. These responses more clearly explain that the proposed Lonesome Wood vegetative treatments are designed to remove mostly smaller sized trees, although larger trees would also be removed to address crown cover, excess fuels and ladder fuels for reduction of fire risk and to change fire behavior. A secondary benefit of thinning of timber stands will be to increase the resiliency of treated stands to insects and disease. The responses also help clarify that the healthiest and best formed trees would be retained, with Douglas fir being the priority species for retention, so that "future stands" will be healthy and vigorous with most of the dead, dying, and damaged trees removed, with fire risk reduced in this wildland urban interface area.

The FEIS responses also more clearly indicate that all practical efforts have been made to minimize the amount of new temporary roads that would be constructed (approximately 6 miles of roads), and no temporary roads, landing roads, and skid trails would be located on, or cross, streams, wetlands, or environmentally sensitive areas. The number of new roads would be the minimum necessary to accomplish the purpose and need of the project and to make the project viable and efficient. New roads will be removed and land restored at the end of the project, thus not permanently adding to the open road system.

As noted in our earlier comments, we are pleased that no change in sediment levels for Watkins Creek is expected, since Watkins Creek is on Montana's Clean Water Act Section 303(d) list of water quality impaired waterbodies, and that a 15 foot no cut streamside/riparian buffer area would be maintained for the small streams in the project area. The Gallatin National Forest fisheries biologist would also evaluate the adequacy of this no cut zone to insure stream bank stability during harvests. We do not have any objections to the proposed project.

The EPA appreciates the opportunity to review the Lonesome Wood Vegetation Management 2 Project and participate in the NEPA process. If you have any questions regarding our input please contact Mr. Stephen Potts of my staff in Missoula at 406-329-3313 or in Helena at (406) 457-5022. We thank you for your consideration.

Sincerely,



Julie A. DalSoglio
Director
Montana Office

cc: Suzanne Bohan/Judy Roos, EPA, 8EPR-N, Denver
Robert Ray/Dean Yashan, MDEQ, Helena